



# **COUNTY OF ORANGE**

## **INTEGRATED WASTE MANAGEMENT DEPARTMENT**

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**SUBJECT: PUBLIC COMMENTS TO THE E-WASTE FORUM HELD ON NOVEMBER 25, 2002**

The County of Orange appreciates the opportunity to provide feedback that may be included in the development of new legislation to innovatively manage the collection and recycling of electronic wastes (e-wastes). The County has provided some issues of concern and how they impact the solid waste landfills and household hazardous waste collection centers, as well as possible solutions for consideration.

The County of Orange operates three (3) non-hazardous solid waste landfills and four (4) permanent Household Hazardous Waste Collection Centers (HHWCCs). The landfills are required to perform load-check surveys to identify and remove unacceptable waste, such as: hazardous materials, liquids, CRTs, refrigerators, etc. The County is required to either return this waste to the generator, if known, or remove it from the landfill for proper storage and disposal. The HHWCCs are open five (5) days per week, four (4) hours each day, for the collection, storage, and disposal of all types of household hazardous waste, including CRTs and other universal wastes. During fiscal year 2001/02, nearly 3 million pounds of waste from over 50,000 participants was collected at the HHWCCs. Items not accepted at the HHWCCs are: asbestos, radioactive materials, medical waste, ammunition, and business generated waste.

The County of Orange has been removing CRTs from the landfills since the landfill ban in March 2001, and has been accepting residential CRTs free of charge at the HHWCCs since March 2002. The cost of disposal is approx. \$0.35 to \$0.65 per pound, depending on the type of CRT. The County has been trying various methods of CRT management and different recyclers for disposal, so the costs have not yet been fully defined.

With the experience that has developed from the collection and management of CRTs, the County of Orange has several issues that need to be considered when promulgating legislation for e-waste:

- Collection – CRTs vary in size from approx. 30 to over 100 pounds, depending on the type. At the HHWCCs, some CRTs require two people to remove them from vehicles, and has become more of a safety issue than the handling of more toxic hazardous wastes. With the collection of e-waste, an increase in vehicle traffic will occur that may deter those with more toxic materials from using the sites.
- Storage – The size of the storage areas at the landfills and the secured HHWCCs is limited in the available space, since they were designed mainly for hazardous chemicals. There has not been enough space to store all the CRTs collected, therefore storage has occurred outside the secured areas. If e-waste must be accepted, then storage of materials will cause additional problems.
- Costs – The County of Orange conducted a study in 2001 that indicated nearly 500,000 CRTs from Orange County households would become obsolete in the next three years and require disposal. At the current time, the HHWCCs are the only option available and based on current disposal rates the cost would exceed \$3 million per year. In 2006, with all e-waste requiring handling as a universal waste, this cost will easily double.

The County is concerned that once the proposed universal waste regulations become effective in 2006, e-waste would no longer be accepted at the landfills, and the HHWCCs will potentially be accepting all residential e-waste. This will increase costs to local government for regulating this waste at the landfills, and for building larger HHWCCs for storage, as well as increasing staff to collect this waste. Therefore, the County would like the State to consider legislation that doesn't rely solely on the local governments becoming responsible for the management of e-waste.

The County recommends that the State consider developing legislation that includes a point-of-purchase fee that incorporates full cost recovery for handling and recycling of the equipment, as well as requiring manufacturers to design their equipment with less toxic materials and ease in dismantling. The County, as most local governments, strongly encourages legislation be written that would allow retailers, manufacturers, solid waste haulers, non-profit organizations, and local government, to obtain financial reimbursement for collection and recycling. The advantages are explained with relation to the issues addressed above.

- Collection – Solid waste haulers in the past provided collection of CRTs and continue to pickup electronic waste. Many haulers offer a bulky-item pickup program for large items and could include CRTs and other e-waste. Many haulers also have material recovery facilities for recyclables that could include handling of e-waste through their process and preventing the transfer to landfills. Retailers deliver electronic equipment and can provide the service of picking up non-working items with delivery of new items. Retailers also offer the convenience of being able to accept e-waste with the purchase of new items. This is currently being performed by some of the larger electronic retail distributors. Non-profit organizations in the past were willing to pickup CRTs knowing that those non-working items could be sent to the landfill, however since the landfill ban on CRTs these organizations ceased in collecting them. Local governments cannot provide collection, however they can offer drop-off locations such as household hazardous waste events and facilities.
- Storage – Solid waste haulers have yards that may be several acres in size and/or warehouse space used for storing recyclable items, and could incorporate e-waste into this area without needing to expand their areas. Retailers have limited storage space, but for each unit sold, space is vacated leaving an area for e-waste items to be kept. Non-profit organizations have yards and stores that the items would be stored in similar to the way they stored CRTs prior to the landfill ban.
- Costs – Solid waste haulers, retailers, and non-profit organizations all would be more willing to work with manufacturers and recyclers if they were able to obtain reimbursement for the collection and disposal of e-waste.

The County also encourages the concept of a third-party organization to collect and manage the point-of-purchase fees, similar to the method established for the RBRC program to collect and recycle rechargeable batteries. An organization to consider is one that has been involved in the on-going legislative process, such as the Electronics Industry Alliance or Silicon Valley Toxics Coalition. Another idea for managing fees would be similar to the beverage bottle and can redemption program where funds are reimbursed to various recyclers.

The State should ensure that local governments are not burdened with the tasks of managing all e-waste generated and the costs for collection, storage, and disposal. The resources available to local government in developing new programs and managing them are diminishing. As well, grants available solely to local government is not a solution, since the grants are limited in funds and time, and requires additional resources and budgeted funds.

In summary, the County of Orange would like the State to promulgate legislation that includes: manufactures to use less toxic materials; redesign of products for ease in repair and recycling; and the collection of a point-of-purchase fee that provides full cost recovery for the management of all regulated e-waste. The legislation must be written to encourage solid waste haulers, retailers, manufacturers, and non-profit organizations to become involved in the collection and recycling of e-waste by providing them cost reimbursement. The solution to proper management of e-waste is not through local governments, but through the cooperation of all who currently handle electronic products.

Thank you for your consideration of these suggestions. You may contact me with any feedback, clarification, or comments.

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